

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**RAFAEL SEGOVIA,  
an individual,**

**PLAINTIFF,**

**v.**

**AHNS GROUP, INC.,  
a domestic corporation,**

**DEFENDANT.**

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**\* Case No. 3:22-cv-535**

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**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT**

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The undersigned counsel, on behalf of Plaintiff, Joey Ramos, moves this Court for entry of a default judgment against Defendant, AHNS GROUP, INC., a limited company, (“DEFENDANT”), upon the complaint heretofore filed and served upon the Defendant, in accordance with the provisions of Rule 55(a) and Rule 55(b)(2) of the Federal Rules of Civil Procedure, and in support thereof shows the Court the following:

1. On March 23, 2022, the Plaintiff filed in the United States District Court, Northern District of Texas, Dallas Division, a Complaint alleging certain violations of the Americans with Disabilities Act. (ECF Document 1)
2. On March 10, 2022, the Court issued a Summons for defendant.

3. On March 23, 2022, a copy of said Complaint and said Summons were served upon the Defendant by private process server licensed in the State of Texas. (ECF Document 7)
4. On April 11, 2022, Plaintiff agreed to an extension for Defendant to file its Answer, making the deadline to file an Answer be April 25, 2022.
5. Defendant has failed to answer, plead or otherwise defend this action by the deadline of April 25, 2022.
6. On May 19, 2022, the Clerk of Court has entered the default of the defendant, AHNS GROUP, INC., a limited company. (ECF Document 10)
7. Pursuant to the provisions of Rule 55(a) and Rule 55(b)(2) of the Federal Rules of Civil Procedure, this Court is empowered to enter a default judgment against the Defendant for relief sought by the Plaintiff in its Complaint, and written notice of this action has been given to the Defendant as set forth in the attached affidavit.

WHEREFORE, Plaintiff prays that this Court enter a judgment of default against the Defendant, and that the Defendant be ordered to fully remedy all barriers to entry as defined by the ADA that are present at the property that is the subject of this litigation as alleged in his Complaint. Further, Plaintiff prays for an award of attorney's fees consistent with the provisions of the ADA to be determined by subsequent affidavit and/or hearing.

This 19<sup>th</sup> day of May, 2022.

Respectfully submitted,

By: /s/ Duncan Strickland

Duncan Strickland  
Counsel for Plaintiff

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**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been sent to the Service List via United States Postal Service First Class mail and by United States Postal Service Certified mail (tracking: 9407-1118-9876-5879-4665-18) on the 19<sup>th</sup> of May, 2022.

*/s/ Duncan Strickland*

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